

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION**

DOCKET NO. 2021-349-E

Joint Petition of Duke Energy Carolinas,	)	
LLC, and Duke Energy Progress, LLC, to	)	
Request the Commission to Hold a Joint	)	PETITION TO INTERVENE
Hearing with the North Carolina Utilities	)	
Commission to Develop Carbon Plan	)	

The Clean Power Suppliers Association (“CPSA” or “Petitioner”) respectfully petitions the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned dockets pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioner states as follows:

1. On November 9, 2021, Duke Energy Carolinas, LLC’s (“DEC”) and Duke Energy Progress, LLC (“DEP,” and together with DEC, “Duke”) filed a petition (“Petition”) with the Commission requesting that the Commission and the North Carolina Utilities Commission (“NCUC”) hold a joint proceeding to develop a Carbon Plan as required under North Carolina H.B. 951. The bill requires that the NCUC approve a Carbon Plan for DEC and DEP to achieve a 70% reduction in carbon emissions from 2005 levels by 2030. Those plans must be developed and approved by the NCUC by December 31, 2022.

2. The Petition proposes that the Commission and NCUC hear evidence and develop a record, with the NCUC chair presiding, at the joint proceeding. The Petition further requests that the Commission issue an order by January 31, 2023, requiring that the final Carbon Plan be incorporated into the Companies’ 2023 South Carolina Integrated Resource Plans (“IRPs”).

3. CPSA is a non-profit corporation formed under the laws of North Carolina, with members doing business in South Carolina. CPSA's mission is to promote a sustainable future through the development of independent renewable energy resources in the Carolinas. CPSA's members are primarily developers of independent solar generating facilities in South Carolina and North Carolina. CPSA believes that independently developed renewable resources can deliver substantial benefits to the grid and to ratepayers while also satisfying customer demands for clean, carbon-free energy.

4. CPSA is actively involved in the implementation of H.B. 951. As developers of utility-scale independent renewable energy projects in South Carolina and North Carolina, CPSA and its members have a direct and substantial interest in this proceeding.

5. CPSA's participation in this docket will also bring critical insight, knowledge, and understanding to the proceeding.

6. CPSA's principal office is located at 5310 South Alston Avenue, Building 300, Durham, NC 27713.

7. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, CPSA is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina, and requests that the undersigned counsel be added to the service list:

Nicolas J. Cherry, SC Bar No. 102671  
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8. CPSA consents to service via electronic mail and requests that all communications regarding this docket should be directed to CPSA's counsel of record.

WHEREFORE, for the reasons set forth above, CPSA prays that it be allowed to intervene as a party of record and participate fully in this matter.

Respectfully submitted this the 30th day of December 2021.

FOX ROTHSCHILD LLP

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*Counsel for Clean Power Suppliers Association*

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<sup>1</sup> Mr. Snowden will seek leave and move to appear *pro hac vice* in this docket.

# **CERTIFICATE OF SERVICE**

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the Petition to Intervene on behalf of the Clean Power Suppliers Association.

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This the 30th day of December 2021.

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